

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

<b>PACE-O-MATIC, INC.,</b>	:	
	:	
<b>Plaintiff,</b>	:	<b>NO. 1:20-cv-292</b>
	:	
<b>v.</b>	:	<b>ELECTRONICALLY FILED</b>
	:	
<b>ECKERT SEAMANS CHERIN &amp;</b>	:	<b>JUDGE WILSON</b>
<b>MELLOTT, LLC, MARK S.</b>	:	
<b>STEWART and KEVIN M.</b>	:	<b>JURY TRIAL DEMANDED</b>
<b>SKJOLDAL,</b>	:	
	:	
<b>Defendants.</b>	:	

**PACE-O-MATIC, INC.'s MOTION FOR LEAVE TO  
FILE SECOND AMENDED COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 15(a)(2) and for the reasons set forth in the accompanying brief in support, Plaintiff Pace-O-Matic, Inc. respectfully requests leave to file its proposed Second Amended Complaint, a copy of which is attached as Exhibit 1 to this Motion. A version of the Second Amended Complaint reflecting changes from the First Amended Complaint is attached as Exhibit 2 to this Motion. As noted in the accompanying brief, counsel for Defendants have indicated that they do not concur in this Motion.

Respectfully submitted,

HUSCH BLACKWELL LLP

/s/ Jeffrey B. Jensen

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# Application for special admission forthcoming

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***Counsel for Plaintiff Pace-O-Matic, Inc.***

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Second Amended Complaint was served upon the following counsel of record via the Court's ECF filing system on this 29th day of June 2022:

Abraham C. Reich, Esquire  
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/s/ Jeffrey B. Jensen